



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 7, 2022

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BY ECF

Hon. Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Encarnacion-Velez et al.*, 21 Cr. 225 (MKV)

Dear Judge Vyskocil:

The parties write to provide a joint status update for this matter in advance of the status conference scheduled for February 10, 2022 at 11:00 a.m.

The parties have conferred and the defendants propose the following schedule for motions practice:

April 15, 2022: Defense motions due
May 13, 2022: Government response to any motions due
May 27, 2022: Defense replies due

The Government has no objection to the defendants' proposed schedule. The parties propose adjourning this week's conference until a date after May 27, 2022 that would be convenient for the Court to hear oral argument on any motions.

The parties are also prepared for the Court to schedule a trial date. Due to defense counsel conflicts in July through September 2022, the defendants request that any trial date be scheduled no sooner than October 2022. The Government has no objection and will be prepared for any trial date the Court sets. The parties estimate the trial will take no longer than one week.

All defendants consent to an exclusion of time under the Speedy Trial Act up to and including the next conference date set by the Court.

Respectfully submitted,


DAMIAN WILLIAMS
United States Attorney

by: /s/
Matthew R. Shahabian
Assistant United States Attorney
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CC: Counsel of Record (by ECF)

This request is GRANTED. The status conference that was previously scheduled to take place on February 10, 2022 is ADJOURNED to June 9, 2022 at 11:30 a.m. Defense motions are due on April 15, 2022, the government's opposition is due on May 13, 2022, and replies are due on May 27, 2022. On the consent of all defendants, in the interests of justice, all time is excluded until June 9, 2022.

Date: February 8, 2022
New York, New York


Mary Kay Vyskocil
United States District Judge